

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,	)	CR. NO. 05-00325 HG-03
	)	
Plaintiff,	)	DECLARATION OF COUNSEL
	)	
vs.	)	
	)	
AUDREY PACHECO, fka	)	
AUDREY PULGADOS,	)	
	)	
Defendant.	)	

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**DECLARATION OF COUNSEL**

I, DANIEL T. PAGLIARINI hereby declare as follows:

1. That I am counsel for defendant, AUDREY PACHECO, fka AUDREY PULGADOS, having been appointed pursuant to the Criminal Justice Act.

2. That 18 U.S.C. § 4285 reads as follows:

“Any judge or magistrate judge of the United States, when ordering a person released under chapter 207 on a condition of his subsequent appearance before that court, any division of that court, or any court of the United States in another judicial district in which criminal proceedings are pending, may, when the interests of justice would be served thereby and the United States judge or magistrate judge is satisfied, after appropriate inquiry, that the defendant is financially unable to provide the necessary transportation to appear before the required court on his own, direct the United States marshal to arrange for that person's means of non-custodial transportation or furnish the fare for such transportation to the place where his appearance is required, and in addition may direct the United States marshal to furnish that person with an amount of money for subsistence expenses to his destination, not to exceed the amount authorized as a per diem allowance for travel under section 5702(a) of title 5, United States Code.

3. Defendant AUDREY PACHECO, who is indigent, currently resides in Kona Hawaii, Hawaii and cannot afford roundtrip airfare to attend her sentencing scheduled before this court on January 11, 2007.

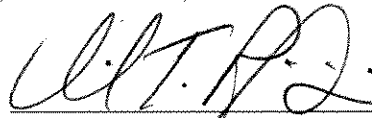
4. Declarant has been quoted the approximate total cost of roundtrip interisland air travel on Aloha Island Airlines for departure and return on January 11, 2007 to be approximately \$70.00 purchased online, and \$130.00 purchased via telephone.

5. Declarant is not requesting any per diem, nor any other incidental charges related to Defendant Pacheco's prospective travel.

6. Based upon the foregoing, Declarant requests this court to issue the attached order directing the U.S. Marshal's Service to arrange for Defendant's roundtrip interisland transportation from Kona, Hawaii to Honolulu, Hawaii, as supervised by U.S. Pretrial Services.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF.

DATED: Honolulu, Hawaii, December 26, 2006.

A handwritten signature in black ink, appearing to read 'D.T. Pagliarini', is written over a horizontal line.

DANIEL T. PAGLIARINI  
Attorney for Defendant  
Audrey Pacheco, fka  
Audrey Pulgados